

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----  
JOAQUIN FRANQUI III, Administrator of the Estate  
of JACK FRANQUI IV,

Plaintiff,

-against-

THE COUNTY OF SUFFOLK, SUFFOLK COUNTY  
POLICE DEPARTMENT, POLICE OFFICER  
KAREN GREINIA, POLICE OFFICERS JOHN AND  
JANE DOES 1-10,

Defendants.

**RESPONSE TO**  
**PLAINTIFFS' THIRD DEMAND**  
**FOR PRODUCTION**  
**OF DOCUMENTS & THINGS**

SIMON EARL, NICHOLAS EARL, AND ANNE  
EARL,

CV13-5943(JS)(WDW)

Plaintiffs,

-against-

THE COUNTY OF SUFFOLK, SUFFOLK COUNTY  
POLICE DEPARTMENT, POLICE OFFICER  
KAREN GREINIA, POLICE OFFICERS JOHN AND  
JANE DOES 1-10,

Defendants.

-----X

Defendants hereby respond to plaintiffs' Third Demand for Production of Documents and  
Things dated July 1, 2014 as follows:

1) Objection on grounds of overbreadth, irrelevance and burdensomeness. Without  
waiving the forgoing objections, defendants are willing to provide copies of Suffolk County  
Police Department Internal Affairs Bureau ("IAB") reports of investigations of prior complaints  
of excessive force against defendant Greinia, if any.

2) Objection on grounds of overbreadth, irrelevance and burdensomeness.

3) Objection on grounds of overbreadth, irrelevance and burdensomeness.

4) Objection on grounds of redundancy; previously produced.

5) To be provided.

6) Objection on grounds of redundancy; previously produced. If there are any additional materials responsive to this request, same will be provided upon conclusion of the IAB investigation.

7) Objection on grounds of irrelevance, overbreadth, burdensomeness and harassment.

8) Objection on grounds of redundancy; previously produced. If there are any additional materials responsive to this request, same will be provided upon conclusion of the homicide Squad investigation

9) Objection on grounds of redundancy; previously produced.

10) Objection on grounds of redundancy; previously produced.

11) Objection on grounds of overbreadth, irrelevance and burdensomeness.

12) Objection on grounds of redundancy; previously produced.

13) Objection on grounds of redundancy; previously produced.

14) Objection on grounds of redundancy; previously produced.

15) Objection on grounds of redundancy; previously produced. If there are any additional materials responsive to this request, same will be provided upon conclusion of the IAB investigation.

16) Objection on grounds of redundancy; previously produced.

Dated: Hauppauge, New York  
August 12, 2014

Yours etc.,  
Dennis M. Brown  
Suffolk County Attorney  
Attorney for Defendants County of Suffolk, Suffolk  
County Police Department and Grenia  
H. Lee Dennison Building  
100 Veterans Memorial Highway  
Hauppauge, New York 11788

By:

  
Arlene S. Zwillling  
Assistant County Attorney